

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

FILED
U.S. DISTRICT COURT
AUGUSTA DIV.

LEVI T. WHITE

PLAINTIFF

VS

CONVERGENT OUTSOURCING INC

Defendant

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}
}
}

2014 JUN -2 A 10:11

CLERK Shilton
SO. DIST. OF GA.

Case No CV 114 105

REQUEST FOR CLERK'S ENTRY OF DEFAULT

Levi T. White, the Plaintiff in this case, deposes and say under penalty of perjury:

1. I am the Plaintiff in the above-entitled action. I am familiar with all the facts and circumstances in this action.
2. I make this affirmation pursuant to Rule 55.1 and 55.2(A) of the Federal Civil Rules for the Southern District of Georgia in support of Plaintiff's application of the entry of a default judgment against Defendant CONVERGENT OUTSOURCING INC,.
3. This is a action to recover statutory damages owed by the Defendant CONVERGENT OUTSOURCING INC, for violation of the Fair Credit Reporting Act, (FCRA) and the Fair Debt Collection Practices Act, (FDCPA). The Defendant is not an infant, in the military, nor an incompetent person.
4. Jurisdiction of the subject matter is base on Plaintiff at all times being a citizen of the United States and resident of Richmond County, Georgia.
5. This action was commenced on April 24, 2014 by the filing of the summons and complaint. A copy of the summons and complaint was served on the Defendant on May 7, 2014 by James Signorelli from GARY'S PROCESS SERVICE,

INC. Service was made via United States Postal Service on May 2, 2014 requiring a signed receipt certificate number 7013 3020 0000 3503 3316 pursuant to FRCP 4 and 12 on the defendant CONVERGENT OUTSOURCING INC, located at 800 SW 39 TH ST, RENTON WA 98057. Proof of service was filed with the Clerk of the Court and the Court assigned the case number CV 114 105.

6. Defendant has not answered the complaint and the time to answer the complaint has expired ref FRCP 12.

7. This action seeks judgment for statutory damages in the amount of \$4000.00 plus cost which is justly due and no part has been paid to date.

WHEREFORE, Plaintiff requests the entry of Default and entry of Judgment against the Defendant.

Dated: In Augusta, Georgia June 2, 2014

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Levi T. White", written over a horizontal line.

**Levi T. White
2225 Morningside Dr.
Augusta, Georgia 30904
706-294-8822**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

LEVI T. WHITE
PLAINTIFF

VS

Case No CV 114 105

CONVERGENT OUTSOURCING INC
Defendant

AFFIDAVIT OF FALIURE TO PLEAD OR DEFEND
AS TO CONVERGENT OUTSOURCING INC,

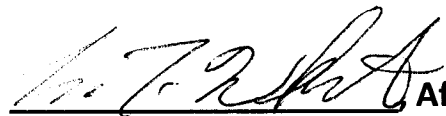
The undersigned, being duly sworn, upon deposes and say:

1. That he is Plaintiff and has personal knowledge of the facts set forth in this affidavit;
2. That Plaintiff on April 24, 2014 filed in this action a Complaint against the Defendant including CONVERGENT OUTSOURCING INC,.
3. That the Summons for CONVERGENT OUTSOURCING INC was issued in this matter on May 2, 2014;
4. That the Summons for CONVERGENT OUTSOURCING INC issued in this matter was served on Defendant CONVERGENT OUTSOURCING INC, by James Signorelli from Gary's Process Service 14973 Interuban Ave # 201 Seattle WA 98168, on May 7, 2014;
5. That evidence of service of the Summons on CONVERGENT OUTSOURCING INC is being filed with the Court as an attachment to this Affidavit;

6. That not less than 21 days have elapsed since service of the Summons and Complaint upon CONVERGENT OUTSOURCING INC;


7. That examination of the Court files and records in this action shows that CONVERGENT OUTSOURCING INC, has failed to plead or otherwise defend as to Plaintiff's Complaint;

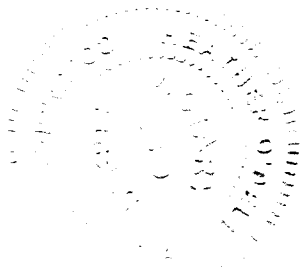
8. That this Affidavit is executed by the affiant herein for the purpose of enabling Plaintiff to obtain an Entry of Default against CONVERGENT OUTSOURCING INC for failure to plead or otherwise defend as to Plaintiff's Complaint.

 Affiant

Levi T. White

Subscribed and sworn to before me this 2 day of June, 2014.

 Notary Public



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA

LEVI T. WHITE
PLAINTIFF

VS
CONVERGENT OUTSOURCING INC
Defendant

Case No CV 114 105

AFFIDAVIT IN SUPPORT OF CLERK'S ENTRY OF DEFAULT

I hereby certify that I am the plaintiff or the attorney of record for the plaintiff in the above cause, and the defendant CONVERGENT OUTSOURCING INC was served by the following method:

Certified Mail # 7013 3020 0000 3503 3316 by James Signorelli from GARY'S
PROCESS SERVICE, INC.

I further certify that the defendant has failed to serve an answer or other responsive pleading no extension has been granted or any extension has expired; the defendant is neither an infant (under age 21) nor an incompetent person; the defendant is not in the active military service of the United States of America or its officer or agents or was not six months prior to the filing of the case.

The Clerk is requested to enter a default against said defendant.

Date June 2, 2014

Respectfully submitted

By: 

Levi T. White, Pro se
2225 Morningside Dr.
Augusta Ga. 30904
nazinga58@yahoo.com
706-294-8822

CASE NUMBER CV 114 105

COST INCURRED AND STATUTORY DAMAGE

1. UNITED STATES DISTRICT COURT SOUTHERN DISTRICT COURT FILING FEE	\$ 400.00
2. CERTIFIED MAIL POSTAGE FEE	\$11.60
3. GARY'S PROCESS SERVICE FEE	\$ 65.00
4. FAIR CREDIT REPORTING ACT (FCRA) SATUTORY DAMAGE TOTAL	\$3000.00
5. FAIR DEBT COLLECTION PRACTICES ACT (FDCPA) STATUTORY DAMAGE TOTAL	\$1000.00
TOTAL COST INCURRED AND STATUTORY DAMAGE	<u>\$4,476.60</u>

COPY

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

FILED
U.S. DISTRICT COURT
AUGUSTA DIV.

PROOF OF SERVICE

2014 MAY 16 P 3:19

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for (name of individual and title, if any) CONVERGENT OUTSOURCING INC. ^{CLERK 25}
 was received by me on (date) _____ SO. DIST. OF GA.

☐ I personally served the summons on the individual at (place) _____

on (date) _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with (name) _____

, a person of suitable age and discretion who resides there,

on (date) _____, and mailed a copy to the individual's last known address; or

☒ I served the summons on (name of individual) ALISIA STEPHENS, who is
 designated by law to accept service of process on behalf of (name of organization) CONVERGENT
OUTSOURCING on (date) 5/7/14 ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other (specify): _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: 5/8/14

 Server's signature

JAMES SIGNORELLI
 Printed name and title

 Server's address

Additional information regarding attempted service, etc:

RETURN OF SERVICE

**UNITED STATES DISTRICT COURT
SOUTHERN District of GEORGIA**

Case Number: CV114 105

Plaintiff:
LEVI T. WHITE

Service Documents:
SUMMONS; COMPLAINT

vs.

Defendant:
CONVERGENT OUTSOURCING, INC

Received by GARY'S PROCESS SERVICE, INC. on the 2nd day of May, 2014 at 12:49 pm to be served on **CONVERGENT OUTSOURCING, INC C/O LEGAL DEPARTMENT, 800 SW 39TH ST, RENTON, WA 98057.**

I, James Signorelli, do hereby affirm that on the **7th day of May, 2014 at 9:42 am, I:**

PERSONALLY delivered at the time and place set forth above, a true and correct copy of the **SUMMONS; COMPLAINT** leaving same with ALISIA STEPHENS-LEGAL DEPARTMENT-LITIGATION SUPPORT SPECIALIST .

Description of Person Served: Age: 30, Sex: F, Race/Skin Color: ASIAN, Height: 5'5", Weight: 110, Hair: BLACK, Glasses: N

RETURN OF SERVICE for CV114 105

I declare under penalty of perjury under the laws of the State of Washington: That I am now and at all times herein mentioned a citizen of the United States and resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above entitled action and competent to be a witness therein.



James Signorelli
KING-877690

GARY'S PROCESS SERVICE, INC.
14973 Interurban Avenue South
Suite 201
Tukwila, WA 98168
(206) 431-5699
Our Job Serial Number: GPT-2014011428

THIS DOCUMENT CONTAINS A TRUE WATERMARK - HOLD UP TO LIGHT TO VIEW

14-873032956

A 342993 D 043014
T 1255 01
148730329562 L 003275

\$ 65.00

PAY EXACTLY SIXTY-FIVE DOLLARS AND NO CENTS

PAY TO THE ORDER OF GARY PROCESS SERVICE PAYMENT FOR/ACCT. #

2225 MORNINGSIDR DR AUGUSTA GA PURCHASER'S ADDRESS

[Signature] PURCHASER'S SIGNATURE

⑆102100400⑆ 40148730329562⑈

MONEY ORDER RECEIPT - NON NEGOTIABLE

ACT 342993 LOC 003275 DT 043014 \$65.00 65DOLLARS AND NO CENTS

Payable to:
RETAIN THIS MONEY ORDER RECEIPT. IT MUST BE INCLUDED WITH ALL REFUND REQUESTS. BE SURE TO READ IMPORTANT INFORMATION BELOW AND ON BACK.
PURCHASE AGREEMENT: You the purchaser agree that Western Union Financial Services Inc. (WUFSI) need not stop payment on, or replace, or refund a lost or stolen WUFSI Money Order unless (1) you fill in the face of the Money Order at the time of purchase, and (2) you report the loss or theft to Western Union Financial Services Inc. in writing immediately, and (3) You provide WUFSI with this original Money Order receipt issued by Western Union Financial Services Inc., Englewood, Colorado. For customer service, call 1-800-959-9660.

* 14873032956 *



LOAD THIS DIRECTION, THIS SIDE UP

LOAD THIS DIRECTION, THIS SIDE UP

GARY'S PROCESS SERVICE, INC.
14973 Interurban Avenue South
Suite 201
Tukwila, WA 98168
Phone: (206) 431-5699
Fax: (206) 431-5695

INVOICE

Invoice #GPT-2014011428
5/8/2014



Levi White
 225 Morningside Dr
 Augusta, GA 30904

Case Number: SOUTHERN CV114 105

Plaintiff:
LEVI T. WHITE

Defendant:
CONVERGENT OUTSOURCING, INC

Received: 5/2/2014 Served: 5/7/2014 9:42 am GPS/PERSONAL / CORP. SERVICE
 To be served on: CONVERGENT OUTSOURCING, INC C/O LEGAL DEPARTMENT

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee (Local)	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
05/02/2014 #14-873032956 Pre-Payment			65.00
BALANCE DUE:			\$0.00

Thank you for your business!

If paying off this invoice please include a copy with your check.
 Visit garysprocessservice.com for status and request for service forms.

CERTIFICATE OF SERVICE

The true and correct copy of the foregoing documents was sent to the below named parties by Certified Mail # 7013 3020 0000 3503 3323.

Signed JUNE 2, 2014

A handwritten signature in black ink, appearing to read "Alisia Stephen", is written over a horizontal line.

**ALISIA STEPHEN
LEGAL DEPARTMENT -LITIGATION SUPPORT SPECIALIST
CONVERGENT OUTSOURING INC
800 SW 39TH ST
RENTON WA 98057
1-206-264-1267
1-206-322-4500**